

ACCSC ACCREDITATION ALERT

To: ACCSC-Accredited Institutions and Other Interested Parties
From: Michale S. McComis, Ed.D., Executive Director
Date: March 25, 2011
Subject: Clock-Hour-to-Credit Hour Conversion and Recognition of Work Outside of Class

Background:

During the Program Integrity Negotiated Rulemaking Session, the U.S. Department of Education (“the Department”) introduced new regulations pertaining to the conversion of clock hours to credit hours for the purposes of determining program eligibility for federal Title IV student financial aid. The Department’s proposed revision would have required all clock hours to be converted using a 37.5:1 semester credit hour formula (or 25:1 quarter credit hour) replacing the current 30:1 semester credit hour (20:1 quarter credit hour) formula. The purpose for this revision was to align eligibility for all programs and to not allow programs with less than 900 clock hours to be fully eligible for Title IV funds, as the 30:1 formula allows. As a negotiator, I, along with others knowledgeable on this topic, argued that clock hour programs should have an allowance to show outside work just as credit hour courses do. The Department agreed and included an allowance for the recognition of outside work in clock hour programs when determining program eligibility, so long as an institution’s accrediting agency provides such recognition.

New Regulations:

In the October 29, 2010 Federal Register, the Department issued new regulations that will go into effect July 1, 2011 pertaining to, among other things, the formula to be used when converting clock hours to credit hours for the purposes of determining program eligibility for federal Title IV student financial aid. The revised language in §668.8 (l)(2) reads as follows:

§ 668.8 Eligible program

- (1) *Formula.* (1) Except as provided in paragraph (l)(2) of this section, for purposes of determining whether a program described in paragraph (k) of this section satisfies the requirements contained in paragraph (c)(3) or (d) of this section, and of determining the number of credit hours in that educational program with regard to the title IV, HEA programs—
 - (i) A semester hour must include at least 37.5 clock hours of instruction;
 - (ii) A trimester hour must include at least 37.5 clock hours of instruction; and
 - (iii) A quarter hour must include at least 25 clock hours of instruction.
- (2) The institution’s conversions to establish a minimum number of clock hours of instruction per credit may be less than those specified in paragraph (l)(1) of this section, if the institution’s designated accrediting agency, or recognized State agency for the approval of public postsecondary vocational institutions, for participation in the title IV, HEA programs has

[not]¹ identified any deficiencies with the institution's policies and procedures, or their implementation, for determining the credit hours, as defined in 34 CFR 600.2, that the institution awards for programs and courses, in accordance with 34 CFR 602.24(f), or, if applicable, 34 CFR 603.24(c), so long as—

- (i) The institution's student work outside of class combined with the clock-hours of instruction meet or exceed the numeric requirements in paragraph (l)(1) of this section; and
- (ii) (A) A semester hour must include at least 30 clock hours of instruction;
(B) A trimester hour must include at least 30 clock hours of instruction; and
(C) A quarter hour must include at least 20 hours of instruction.

As per these revisions, an institution may use the conversion formulas currently in place if the institution's accrediting agency recognizes work outside of class combined with the clock-hours of instruction and that the sum of these hours is minimally 37.5 per semester credit hour (or 25 per quarter credit hour).

New ACCSC Policy:

In order to accommodate the new federal requirements described above, ACCSC has developed a process to evaluate and recognize academic work outside of class in a clock hour program. Member institutions are encouraged to review curriculum for currently approved programs in order to determine the extent to which students are required to engage in work outside of class. Student work outside of class may include assignments with specific requirements, such as reading assignments in preparation for specific tasks, writing assignments, practice and practical application assignments, portfolio development, projects, or other equivalent learning experiences that are assessed/graded. In all cases, the required work to be recognized outside of class must be articulated through a course syllabus and an institution must be able to justify the number of hours estimated for that outside-of-class work. The student's work outside of class must be consistent with program or course educational goals and objectives, documented, assessed/graded, and serve as an integral part of the structured, sequenced educational program as described in the syllabus. Moreover, schools will be required to show the correct and consistent application of policies and procedures relative to academic programs, coursework, and the award of credit.

Additionally, to better align Commission policies and procedures with the new federal definition of a credit hour, the Commission will revise its clock hour to credit hour conversion formula to take into account the review and recognition of outside-classroom work/preparation. The Commission's decision regarding the clock hour to credit hour conversion formula will be forthcoming.

Procedures for Modifications for Existing Programs:

Changes to Program Length Taking into Account Recognition of Outside Work:

Schools may request the Commission's review and approval of the use of outside-the-classroom work for currently approved programs through the submission of an updated Application for Clock Hour to Credit Hour Conversion (to include the fee) and the justification described above. If a school using the Commission's new process demonstrates that an 800 clock hour program includes 100 hours of

¹ The Department of Education confirmed to ACCSC that the October 29, 2010 Federal Register inadvertently omitted the word "not" and that a revision is forthcoming.

work outside of class, then the program would be approved for academic purposes as an 800 clock hour program and 900 total clock hour program with a notation that the total hours represents an estimate of outside work as the examples below show.

Example 1 – Addition of Only Outside Work

	Program	Instructional Clock Hours	Outside Work Hours	Total Clock Hours*	Application to be Submitted
Current Program	Program A	800	0	800	Application for Clock to Credit Hour Conversion (03/25/11)
Revised Program	Program A	800	100	900	

* Total Clock Hours includes the estimated amount of outside work included with this program.

Example 2 – Addition of Outside Work and Changes to Current Clock Hours (less than 25%)

	Program	Instructional Clock Hours	Outside Work Hours	Total Clock Hours*	Applications to be Submitted
Current Program	Program A	800	0	800	Application for Clock to Credit Hour Conversion (03/25/11) Program Modification Report - Nonsubstantive Modification (03/25/11)
Revised Program	Program A	850	50	900	

* Total Clock Hours includes the estimated amount of outside work included with this program.

Example 3 – Addition of Outside Work and Changes to Current Clock Hours (equal to or greater than 25%)

	Program	Instructional Clock Hours	Outside Work Hours	Total Clock Hours*	Applications to be Submitted
Current Program	Program A	800	0	800	Application for Clock to Credit Hour Conversion (03/25/11) Application for Substantive Program Modification (03/25/11)
Revised Program	Program A	1000	100	1100	

* Total Clock Hours includes the estimated amount of outside work included with this program.

Please also note that federal requirements relating to the allocation of academic credit hours for Title IV student financial aid purposes do vary from ACCSC’s requirements. Institutions eligible to participate in the Title IV programs must comply with federal credit and clock hour requirements for certain federal purposes, including determining institutional, programmatic and student eligibility for Title IV participation. For academic and accreditation purposes (e.g., how a program is presented in advertising, the catalog, and enrollment agreement), the school would use the approved “Instructional Clock Hours.” For federal Title IV purposes, the school would use the “Total Clock Hours.”

Changes to Program Length Not Taking into Account Outside Work:

If the total number of instructional clock hours require changes not taking into account outside work (e.g., a change in the number of instructional clock hours delivered from 800 to 900), the school must submit the appropriate program modification application (substantive or non-substantive) in conjunction with the updated Application for Clock Hour to Credit Hour Conversion (to include the

fees). The program modification submission must include justification for the increase in hours and in keeping with *Section II (A)(2)(a), Substantive Standards, Standards of Accreditation*, demonstrate that the new program length is appropriate and necessary to enable students to achieve the program objectives and to acquire the knowledge, skills, and competencies required for employment. Access to federal Title IV student financial aid alone is insufficient justification to approve a change in program length.

Example 1 – Addition of Clock Hours (less than 25%)

	Program	Instructional Clock Hours	Outside Work Hours	Total Clock Hours	Application to be Submitted
Current Program	Program A	800	0	800	Program Modification Report - Nonsubstantive Modification (03/25/11)
Revised Program	Program A	900	0	900	

Example 2 – Addition of Clock Hours (equal to or greater than 25%)

	Program	Instructional Clock Hours	Outside Work Hours	Total Clock Hours	Application to be Submitted
Current Program	Program A	800	0	800	Application for Substantive Program Modification (03/25/11)
Revised Program	Program A	1000	0	1000	

Affiliated Schools:

The Commission has established a process for affiliated schools to apply for multiple programs across multiple schools. In such cases, please use the Application For Clock Hour To Credit Hour Conversion – Affiliated Schools.

Contacts:

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